

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAVID FOLKENFLIK; NATIONAL PUBLIC RADIO, INC.; EDITH CHAPIN; LESLIE COOK; AND PALLAVI GOGOI,	§	
Movants,	§	CIVIL ACTION NO. 4:20-MC-00038-ALM
v.	§	
KIM SAMS,	§	<i>Ancillary to CIVIL ACTION NO. 4:18-CV-00442-ALM (E.D. Tex.)</i>
Respondent.	§	

**UNOPPOSED MOTION TO FILE REPLY IN SUPPORT OF MOTION TO COMPEL
KIM SAMS TO COMPLY WITH FED. R. CIV. P. 45 SUBPOENA UNDER SEAL**

Movants David Folkenflik, National Public Radio, Inc., Edith Chapin, Leslie Cook, and Pallavi Gogoi (collectively, “NPR”), respectfully request that the Court permit them to file their Reply in Support of Motion to Compel Kim Sams to Comply with Fed. R. Civ. P. 45 Subpoena and accompanying exhibits (“Reply Brief”) under seal. NPR’s filing relies on and discloses documents and information that have been designated confidential pursuant to the Stipulated Protective Order entered in the ancillary case, *Butowsky v. Folkenflik*, 4:18-cv-442-ALM, on August 8, 2019 (Dkt. 67).

Accordingly, NPR respectfully requests that this Court grant leave to seal NPR’s Reply Brief. Movants will file a redacted version of the Reply Brief publicly within two days pursuant to this Court’s local rule CV-5(a)(7)(E) regarding filing of documents under seal.

Respectfully submitted,

By: /s/ Laura Lee Prather

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Attorneys for Movants

CERTIFICATE OF CONFERENCE

The undersigned Counsel for Movants certifies that on May 8, 2020, counsel for Movants conferred with John Leslie, counsel for Ms. Sams. Ms. Sams is unopposed to the relief sought herein.

/s/ Laura Lee Prather

Laura Lee Prather

CERTIFICATE OF SERVICE

The undersigned certifies that on May 8, 2020, a true and correct copy of the foregoing document was forwarded via e-filing to counsel of record.

/s/ Laura Lee Prather
Laura Lee Prather